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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FELIPE ROBLES VÁSQUEZ p/k/a RALDY
VÁSQUEZ and CAMPEÑO MUSIC
ENTERTAINMENT GROUP, INC.,

NO. 06 CV 0619
(Mc Mahon)

Plaintiffs,

-against-

FERNANDO TORRES-NEGRÓN,

Defendant.
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NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law, Rule 56.1 Statement, and Declaration of Fernando Torres-Negrón dated January 17, 2007, together with all the exhibits attached thereto, as well as all of the prior pleadings and papers filed herein, a motion for summary judgment dismissing the complaint will be made before this Honorable Court on the grounds that (1) the plaintiff's claim is time barred; and (2) defendant did not infringe on plaintiff's song *Nena Linda*.

Dated: New York, New York
January 17, 2007

Yours, etc.

Bennett, Giuliano, McDonnell & Perrone, LLP
Attorneys for Defendant
FERNANDO TORRES-NEGRÓN

A handwritten signature in black ink, appearing to read 'W. R. Bennett, III', written over a horizontal line.

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